

UNITED STATES DISTRICT COURT FOR
SOUTHERN DISTRICT OF NEW YORK

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REACH GLOBAL INC., REACH MUSIC
PUBLISHING, INC. and TERRORDOME MUSIC
PUBLISHING, LLC,

Plaintiffs,

Case No.
1:20-cv-00391-AKH

-against-

CARLTON RIDENHOUR and BRING THE NOIZE
MUSIC, INC.,

NOTICE OF MOTION

Defendants.

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CARLTON RIDENHOUR and BRING THE NOIZE
MUSIC, INC.,

Defendants and
Third-Party Plaintiffs,

-against-

MICHAEL CLOSTER,

Third-Party Defendant.

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PLEASE TAKE NOTICE that, upon the accompanying Declaration of Edward P. Grosz, and the exhibit annexed thereto, the accompanying Memorandum of Law and the prior proceedings herein, Plaintiffs Reach Global Inc. (“Reach Global”), Reach Music Publishing, Inc. (“Reach Music”) and Terrordome Music Publishing, LLC (“Terrordome”) and Third-Party Defendant Michael Closter (“Closter”), will move this Court at the Courthouse located at 500 Pearl Street, New York, New York on March 4, 2020, at 9:30 a.m., or as soon thereafter as counsel can be heard, for an Order, pursuant to Federal Rules of Civil Procedure 12(b)(6), dismissing the First, Second and Third Counterclaims and Third-Party Causes of Action in their

entirety, and the Fourth Counterclaim and Third-Party Cause of Action in part, and such further relief as to this Court seems just and proper.

Dated: New York, New York
February 7, 2020

REITLER KAILAS & ROSENBLATT LLC

By: 

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- and -

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Declaration of Edward P. Grosz, dated February 7, 2010

Exhibit 1 – Agreement dated as of October 22, 2001 between Plaintiff Terrordome and Defendant Bring the Noize Music, Inc. (“BNM”) (the “2001 Publishing Agreement”).

Exhibit 2 – Agreement dated October 23, 2001, between Plaintiff Reach Global and Plaintiff Terrordome (the “Administration Agreement”), and an amendment thereto dated December 1, 2006.

Exhibit 3 – Operating Agreement of Plaintiff Terrordome dated January 10, 2002 (the “Operating Agreement”).

Exhibit 4 – Agreement dated as of April 25, 2002 between Plaintiff Terrordome and Defendant Carlton Ridenhour (“Ridenhour”) (the “2002 Publishing Agreement”).

Exhibit 5 – Assignment of Membership Interests in Terrordome Music Publishing, LLC made as of July 6, 2010 (the “Purchase Agreement”).

Exhibit 6 – Agreement dated as of August 1, 2012 among Plaintiffs Reach Music, Reach Global and Terrordome and Defendants Ridenhour and BTNM (the “Amendment Agreement”).